

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Timothy Wyse
Special Agent: Sean Callaghan

Telephone: (313) 226-9144
Telephone: 313-720-5696

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Brooklyn Marino

Case No. Case: 2:22-mj-30050
Assigned To : Unassigned
Assign. Date : 2/1/2022
USA V. SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/1/2019 through 03/20/2020 in the county of Oakland and others in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 1343

18 U.S.C. § 1028A

Offense Description
Conspiracy to commit wire fraud
Aggravated identity theft

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: February 1, 2022

City and state: Detroit, MI


Complainant's signature

Sean Callaghan - Special Agent

Printed name and title


Judge's signature

Kimberly G. Altman - U.S Magistrate Judge

Printed name and title

AFFIDAVIT

I, Sean Callaghan, being duly sworn, state the following:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have investigated a variety of violations, including financial crimes, as an FBI agent for approximately 17 years.

2. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, law enforcement reports that I have reviewed, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

3. This affidavit is in support of a complaint and arrest warrant for Brooklynn Marino. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause to believe that Brooklynn Marino engaged in wire fraud, in violation of 18 U.S.C. § 1343, conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, and aggravated identity theft, in violation of 18 U.S.C. § 1028A.

II. INVESTIGATION AND PROBABLE CAUSE

Background of the Felony Lane Gang

4. Based upon the facts set forth herein, I believe that Brooklynn Marino is a member of a multi-state organized crime group commonly referred to as the Felony Lane Gang (“FLG”).

5. The FLG originated in Fort Lauderdale, Florida and its members travel across the continental United States conducting numerous thefts from vehicles, home invasions, identity thefts, and bank/wire frauds.

6. FLG members use a common modus operandi in the commission of these offenses. An FLG cell typically consists of several male members and at least one female member, who is recruited to impersonate victims and cash fraudulent checks. Cells typically travel from state to state to commit thefts from vehicles, targeting female’s unattended purses. The male members typically use window punches or screwdrivers to shatter the window of the targeted vehicle. The cell will take the victim’s stolen identification, personal checks, and credit/debit cards for the purpose of committing subsequent identity theft and bank/wire fraud. Members of the FLG will often utilize money transfer services to wire proceeds from the criminal activity back to Florida to ensure that they are not found in possession of large sums of money if arrested.

7. The FLG uses rental vehicles, often rented by members’ girlfriends or members not traveling with that cell. FLG members will stay at local hotels and steal

license plates to affix to their rental vehicles while those vehicles are being used to cash fraudulent checks via the drive through teller at local bank branches.

8. The female impersonators typically drive one rental vehicle, usually with a male FLG member in the back seat, who directs the activity at the bank. A second rental vehicle with the remaining members of the cell will usually conduct counter surveillance around the bank and alert the other vehicle if police respond.

9. The FLG typically will not stop if police attempt to conduct a traffic stop after responding to a fraud alert from the banks. FLG members and impersonators are trained to take police on high-speed chases because they know most police departments will often decide to terminate the chase in the interest of public safety.

FLG Conduct Involving Brooklynn Marino

10. On December 6, 2018, the Fairfax County (Virginia) Police Department arrested two individuals, C.T. and T.S., who attempted to cash a fraudulent check via the drive through teller at a bank in Springfield, Virginia. C.T., who was interviewed by police stated that T.S. was recruited to cash stolen checks by her friend, Brooklynn LNU. C.T. provided a cellular telephone number for Brooklynn LNU. Open-source database checks reveal that number to be associated with Brooklynn Marino.

11. On May 9, 2019, the Roseville Police Department in Roseville, California arrested several FLG suspects in connection with a string of vehicle burglaries. The arrestees included D.M., M.C., V.C., B.B., M.C.2., and Brooklynn

Marino. The arrestees were stopped driving a rented Dodge Caravan. A search of the vehicle revealed several items that had been stolen in the vehicle burglaries. The subjects threw stolen credit cards and gift cards out the window of the vehicle. Victims of the vehicle burglaries had fraudulent charges on their credit cards attempted at Wal-Mart stores located in the Rocklin/Roseville area.

12. On May 23, 2019, Brooklynn Marino was arrested by the Delaware County Sheriff's Office in Delaware, Ohio on multiple counts of Identity Fraud and Receiving Stolen Property. Marino was in a rented Dodge Durango with V.C. and D.M. Numerous checks, credit cards, and license plates were recovered that belonged to victims of recent thefts from vehicles. Property recovered during the stop and arrest belonged to victims in Kentucky, Ohio and Pennsylvania dating back to March of 2019. Another individual, A.B. was observed walking back to a rented Jeep and was briefly detained but not arrested.

13. On June 4, 2019, the Sumter County Sherriff's Office arrested Brooklynn Marino and D.M. after performing a traffic stop on a 2019 Toyota Highlander in Sumter, South Carolina. The vehicle was rented by A.B. in Cleveland, Ohio on May 20, 2019. A search of the vehicle revealed the following stolen items hidden in the head liner of the vehicle: 6 social security cards, 46 driver's licenses from multiple states, 101 credit cards and multiple checks from 11 different victims. Police also found 68 newly purchased gift cards. Many of the driver's licenses were State of Michigan

licenses. Affiant discovered that many of these licenses were stolen during thefts from vehicles on June 1, 2019, in Farmington Hills, Northville Township and Canton, Michigan.

14. On January 8, 2020, Brooklynn Marino flew to Columbus, Ohio for her criminal trial in connection with the May 23 arrest in Delaware, Ohio described above. Marino rented a 2019 Mitsubishi Outlander from the Dollar Rental Car at the airport. Marino was convicted at trial and released pending sentencing.

15. On January 10, 2020, a jury found Brooklynn Marino guilty on six felony counts related to her May 23rd arrest. Marino was released on bond pending her sentencing which was set for February 11, 2020. Marino did not appear for sentencing so her bond was revoked, and a warrant was issued for her arrest. A review of jail calls between D.M. and Marino reveal that Marino continued to travel across the country to engage in large scale identity theft and bank fraud when she was on bond and obligated to appear on her sentencing. To date, Marino has still not appeared for sentencing in this matter.

16. On January 12, 2020, the West Bloomfield, Michigan, Police Department responded to a larceny from automobile report at Sheiko Elementary School involving Victim N.S. Several minutes after N.S. returned to her vehicle to discover her purse missing she received a call from her credit card company indicating that a \$400.00 transaction was completed with her card at a Meijer store. Police reviewed surveillance

video from the school and identified a suspect vehicle, a white Chevrolet Trailblazer. The total value of items taken from N.S.'s vehicle was \$1,091.00. Victim N.S. advised that, after the theft, her credit cards were used without her permission at Meijer, Rite Aid and Panda Express for approximately \$850.00 in fraudulent charges.

17. On January 12, 2020, the Ann Arbor, Michigan, Police Department (AAPD) was dispatched to Maple-Liberty Park in Ann Arbor on a larceny from automobile involving Victim K.B. K.B. advised that a credit card that had been stolen was used at a Kroger on S. Maple Road in Ann Arbor to conduct two separate transactions for \$211.90. K.B. then received an alert that her credit card was being used at a Rite Aid to conduct a transaction for \$217.15. K.B. indicated that the total loss from items taken from her vehicle and the repair of her window was \$545.00.

18. On January 13, 2020, the Royal Oak, Michigan, Police Department (ROPD) was dispatched to the scene of a larceny from automobile. ROPD officers contacted Victim S.R., who had returned to her vehicle to find her front passenger window smashed and her purse missing. While speaking with police S.R. began receiving text messages about her stolen credit cards being used. S.R. called her bank and was informed that her credit card was used at a Meijer store in Royal Oak to make a purchase of \$420.25. An attempted transaction at Rite Aid in Troy in the amount of \$419.19 was denied. The value of the items taken from S.R.'s vehicle was \$900.00.

19. On January 13, 2020, the Troy, Michigan, Police Department was dispatched to a larceny from automobile at White Chapel Cemetery involving Victim N.S. Stolen from N.S. was her purse, which contained her wallet and \$100 in cash, credit cards, gift cards, Social Security card, and driver's license. Troy PD broadcast the description of the suspect vehicle involved, a white Chevrolet Trailblazer. The Royal Oak Police Department attempted to stop a white Chevrolet Trailblazer matching the suspect vehicle description involved in the vehicle burglary that occurred at White Chapel Cemetery. The vehicle fled at a high rate of speed and the chase was terminated in the interest of public safety.

20. Police subsequently discovered the Trailblazer, and interviewed a witness who observed four individuals walking away from the vehicle. Two of those individuals, Z.A. and T.W., were arrested at the Kroger grocery store adjacent to where the vehicle was parked. The Trailblazer was rented by Z.A. Found on T.W.'s phone was an image of the credit card stolen from K.B. on January 12, 2020.

21. Police obtained surveillance video from a nearby Saint Vincent DePaul store. A male and female matching the description of the two remaining suspects entered the store, purchased clothing and changed clothes in the store. Affiant reviewed the images and recognized the female suspect to be Brooklynn Marino.

22. Affiant was familiar with Brooklynn Marino based on her arrest in South Carolina on June 4, 2019. As indicated above, several of the driver's licenses and credit

cards recovered from Marino and D.M. were stolen from vehicles in Michigan just a few days prior to their arrests. Known photographs of Marino were compared with the aforementioned images from the surveillance video and appeared to depict the same individual.

23. On January 13, 2020, Z.A. was interviewed and shown the surveillance image. Allen identified the male depicted in the image as “Houdini.” The Fort Lauderdale Police Department provided DF as a possible match for “Houdini” based on his Instagram profile of @houdini_da_sauce.

24. D.F. was interviewed by the FBI and the Boise Police Department in 2014 and admitted to being involved in Felony Lane Gang activity. D.F. admitted to being the driver while other members of the gang committed burglaries and bank frauds. D.F. stated that he did this in Tennessee, Nebraska, Georgia, Wyoming, and Idaho. Known photographs of D.F. were compared with the aforementioned images from the surveillance video and appear to depict the same individual.

25. On January 14, 2020, the Cleveland Police Department arrested D.F. who was traveling in a rental car with two other males and a female. D.F. provided police with a false name, but his fingerprints revealed his identity. Affiant reviewed the body cam video from the arrest and confirmed that the individual arrested was D.F. and that the female traveling with him was Brooklynn Marino.

26. On January 14, 2020, T.W. was re-interviewed and confirmed that the female suspect travelling with D.F. was Brooklynn Marino. T.W. had previously stated that this subject's name was "R.F." T.W. had said that "R.F.'s" cellular telephone number was in her cell phone contacts under "Twin." T.W. had indicated that "R.F." had just been convicted of fraud in a jury trial in Ohio. When confronted with the fact that affiant knew of Marino from prior FLG investigations and knew she had just been convicted of fraud in Ohio, T.W. admitted that the previous identification was a lie and that "R.F." was Brooklynn Marino.

27. The Royal Oak Police Department obtained a search warrant for T.W.'s cell phone. T.W. had a picture in her phone of credit cards from Victims K.B. and N.S. Marino's cellular telephone number, 954-608-1608 was found in T.W.'s phone contacts under "Twin." Affiant discovered that D.M. was incarcerated in Placer County Jail because of the charges stemming from his aforementioned arrest in California on May 9, 2019. Affiant obtained recordings of D.M.'s jail calls and found several calls with telephone number 954-608-1608. A review of those calls revealed that the user of listed number was Brooklynn Marino.

28. On June 4, 2020, T.W. was interviewed again and stated that she met Brooklynn Marino through Instagram in August of 2019. T.W. then traveled to Ohio with Marino in October of 2019. Marino chose Ohio because Marino had to attend court proceedings there but while they were there Marino broke into vehicles to steal

purses. T.W. would then take the stolen credit cards and buy gift cards at stores in the area. T.W. identified herself in surveillance images that depict her utilizing stolen credit cards to purchase gift cards at Walgreens, Drug Mart, and CVS stores on October 21, 2019. T.W. stated that checks were also stolen but she did not cash any checks. T.W. advised that Marino returned to Ohio a week later with S.M. to cash the checks.

29. On September 22, 2020, affiant obtained a federal search warrant and served the same on T-Mobile seeking information associated with cellular telephone number 954-608-1608, including cell site data. The response revealed that listed number was subscribed to Brooklynn Marino. Cell site data reveals that, between October 1, 2019 and March 21, 2021, the phone assigned that number was utilized cell towers in Colorado, Utah, Kansas, Missouri, Texas, Florida, Ohio, Illinois, North Carolina, Iowa, Nebraska, Minnesota, Wisconsin, Indiana, Michigan, New Mexico, Arizona, Nevada, California, Oregon, Georgia, Tennessee and Kentucky.

30. Through analysis of these records, affiant was able to connect Marino to victims of fraud and identity theft in Michigan, Ohio, Nebraska, Kansas, Colorado, and Missouri.

31. For example, cell site records show Marino's phone connecting to a cell tower a half mile away from the Meijer store where victim N.S.'s credit card was used after it was stolen from her vehicle in West Bloomfield on January 13, 2020. This

connection occurred immediately after the theft from N.S.'s vehicle; the Meijer is less than 5 miles away from the scene of the vehicle break-in.

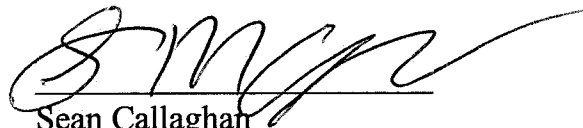
32. Marino rented a car at Cleveland Hopkins Airport on October 17, 2019 and returned it on October 21, 2019. Marino's cell site records put her phone in the vicinity of the vehicle thefts that T.W. spoke of taking place in Ohio between October 18 and October 21, 2019. Victim J.L. had her purse (containing her driver's license) stolen on October 19, 2019; Marino's phone connected to a nearby tower near the time of the theft. Mario's phone also connected to a nearby tower at the time victim L.C. had her purse stolen in Elyria, Ohio on October 19, 2019

33. Marino also rented a car at Cleveland Hopkins Airport on October 26, 2019 and returned it on October 30, 2019. On October 29, 2019, records show Marino's cell phone in the vicinity of a theft from the vehicle of R.T. Marino's cell phone was in the vicinity of a PNC Bank in Montville Township, Ohio, where J.L.'s stolen driver's license was presented in an attempt to cash a check stolen from R.T. and forged to make it appear as if it were a check written to J.L. for \$1,340.00.

34. Victim A.B. had her purse stolen from her vehicle in Nebraska on November 2, 2019. One of checks stolen from A.B. was written out to L.C., and a corresponding deposit/withdrawal was made at a Chase Bank in L.C.'s name in Westminster, Colorado on November 20, 2019. Cell site data shows Marino's phone in the vicinity of the bank transaction in Colorado.

35. Based on the above investigation, probable cause exists that Brooklyn Marino engaged in wire fraud, in violation of 18 U.S.C. § 1344; conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349; and aggravated identity theft, in violation of 18 U.S.C. § 1028A.

Respectfully Submitted,


Sean Callaghan
Special Agent, FBI

Sworn to before me and signed in my presence
and/or by reliable electronic means



Kimberly G. Altman
United States Magistrate Judge

Dated: Detroit, Michigan
February 1, 2022